

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SUOMEN COLORIZE OY,

Plaintiff,

V.

C.A. No. 12-715-CJB

VERIZON SERVICES CORP.,

VERIZON ONLINE LLC, and

VERIZON DELAWARE LLC,

Defendants.

**DECLARATION OF MEGHAN M. RACHFORD
IN SUPPORT OF VERIZON SERVICES CORP., VERIZON ONLINE LLC,
AND VERIZON DELAWARE LLC'S OPENING CLAIM CONSTRUCTION BRIEF**

I, Meghan M. Rachford, declare as follows:

1. I am an attorney at the law firm Kasowitz, Benson, Torres & Friedman LLP, 1349 West Peachtree Street, Suite 1500, Atlanta, GA 30309.

2. I am counsel for Defendants Verizon Services Corp., Verizon Online LLC, and Verizon Delaware LLC (“Verizon”) and was admitted to the Court *pro hac vice* on May 16, 2013 in the above captioned matter.

3. I submit this Declaration in Support of Verizon's Opening Claim Construction Brief.

4. I have first-hand knowledge of the facts set forth herein, or have learned these facts first-hand and if called as a witness, I could and would testify competently and from personal knowledge of these facts.

5. Attached hereto as Exhibit 1 is a true and correct copy of U.S. Patent No. 7,277,398.

6. Attached hereto as Exhibit 2 is a true and correct copy of the cited excerpts of the U.S. Patent and Trademark Office file history for U.S. Patent No. 7,277,398.

7. Attached hereto as Exhibit 3 is a true and correct copy of "EPG," available at http://www.cnet.com/4520-7874_1-5107912-6.html.


8. Attached hereto as Exhibit 4 is a true and correct copy of U.S. Patent No. 5,635,978.

9. Attached hereto as Exhibit 5 is a true and correct copy of U.S. Patent No. 5,630,119.

10. Attached hereto as Exhibit 6 is a true and correct copy of "Electronic program guide," available at http://en.wikipedia.org/wiki/Electronic_program_guide.

I declare under penalty of perjury under the laws of the United States and 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 3rd day of June 2013 in Atlanta, Georgia


Meghan M. Rachford